



**JONATHAN M. WAINWRIGHT MEMORIAL  
VA MEDICAL CENTER  
77 Wainwright Drive  
Walla Walla, Washington 99362**

In Reply Refer To: 687/500

February 26, 2016

Mr. Christopher Daniel  
Advisory Council on Historic Preservation  
1100 Pennsylvania Avenue NW, Room 803  
Washington, D.C. 20004

**Revised Notice of Undertaking**

Regarding the Memorandum of Agreement for Jonathan M. Wainwright VA Memorial Medical Center Specialty Care Clinic and Potable Water System Upgrade Project

Dear Mr. Daniel:

On October 18, 2010 a Notice of Undertaking (NOU) for three proposed projects and associated infrastructure upgrades at the Jonathan M. Wainwright VA Medical Center Campus, Walla Walla, Washington (Walla Walla VAMC) was provided for review by interested and consulting parties. The 2010 NOU stated the following:

*The Walla Walla VA has approval for the construction of three new patient care buildings within the Campus: a Residential Rehabilitation Unit, an Outpatient Clinic, and a Specialty Care Unit. In support of the new buildings, proposed infrastructure improvements include parking lots; road realignments; stormwater basins; and buried electrical, sewer, water, fiber optic, and natural gas lines. A single modern building will be razed, steam line repaired, underground storage tanks removed, and a sweat lodge will be constructed.*

As a result of this NOU and subsequent consultation, a Memorandum of Agreement (MOA) was developed and executed (amongst the Confederated Tribes of the Umatilla Indian Reservation, Department of Archaeology and Historic Preservation, Advisory Council of Historic Preservation, and the Walla Walla VAMC) to provide guidelines for management of historic properties (archaeological and built environment) and to set forth a variety of requirements for historic preservation and mitigation for the Walla Walla VAMC. Since the execution of the MOA by all consulting parties on December 16, 2010, several of the projects listed in the original NOU have been completed or partially completed. The table below lists the projects from the original NOU and whether or not they have been completed.

Project Description	Date Completed
Construction of a new outpatient clinic (OPC) located on the western portion of the consolidated VAMC campus behind the existing Building 86.	Jul-13
Construction of the Residential Recovery Unit (RRU) was constructed on an undeveloped portion of the campus in the western portion of the VAMC consolidated campus.	Feb-13

Project Description	Date Completed
Construction of new parking areas for the OPC and RRU. New and reconfigured parking areas are now situated in the western and southwestern portions of the consolidated campus	Jul-13
Removal of modern Building 129 (emergency generator).	Jul-12
Installation of a new off-site water line specifically for fire suppression (OPC).	Jul-12
Installation of Phase I of the 12kV electrical loop upgrade	Jul-12
Installation of a new sanitary sewer through the western portion of the Campus.	Jul-12
Repair of existing underground steam lines.	Oct-13
Installation of a natural gas line.	Jul-12
Installation of a fiber optic line.	Jul-12
Construction of a new sweat lodge to be located in an undeveloped site in the northwestern portion of the VAMC.	Dec-11
Construction or expansion of the parking area southwest of Building 82.	May-12
Removal of two diesel and gasoline underground storage tanks, associated underground piping, and associated dispensing station west of Building 82.	May-12
Installation of Phase Ia of the potable water line upgrade, to include placement of the new water tower and connecting line	Oct-15
Specialty Care Clinic (SCC) and associated parking lot	Work begins March 1, 2016
Installation of Phase II of the 12kV electrical loop upgrade, to include installation of a campus-wide exterior lighting upgrade	Dec-15
Installation of Phase Ib of the potable water line upgrade	Expected in Summer 2016

Of the three primary construction projects, only the Specialty Care Clinic remains. Construction is expected to begin on March, 1 2016. Of the proposed infrastructure improvements, Phase Ia of the potable water lines has been completed, with Phase Ib expected to begin in 2016, and the parking lot associated with the Specialty Care Clinic will be constructed when the building is completed. The remainder of the infrastructure projects listed in the original NOU and MOA have been completed.

The MOA expired on January 1, 2014; however, construction is ongoing. Although Walla Walla VAMC has continued to comply with the monitoring protocols of the MOA, there is currently no compliance document in place for the ongoing work, even though it is part of the original MOA. Because the MOA has long since expired, it is necessary to re-initiate consultation in order to develop an updated MOA that will include the remaining projects and phases from the original NOU, and updated mitigation measures for current and future historic preservation on the campus. As a result, Walla Walla VAMC is submitting this Revised NOU to re-initiate consultation with the consulting parties and other interested parties in accordance with Section 106 of the National Historic Preservation Act of 1966, and implementing regulations 36 CFR Part 800. This NOU serves to update previous Undertaking Notices (October 18, 2010, October 13, 2009, and November 4, 2009).

As mentioned earlier, the MOA contained several mitigation measures for the preservation and management of cultural resources. Most of these mitigation measures have not been completed. Below is a table listing each measure and the stage of completion.

Mitigation Measure	Stage of Completion
Site Treatment and Management Plan for two archaeological sites, 45WW304 and 45WW305, to be integrated into the Historic Preservation Plan	Although there is certainly a mention for treatment and management of sites in general, there is no reference to either of these two sites in the current draft HPP
Hussey Collection: Artifact Analysis, Curation Plan and Vet Curation Program to be integrated into the HPP	An early Draft Curation Plan was completed along with an MOU between the Fort Walla Walla Museum and VA and circulated to Fort Walla Walla Museum for review prior to my arrival, no final on file; Nothing on the Vet Curation Program, No analysis complete or started
Design Guidelines to be integrated into the HPP	Has been integrated into the Draft HPP
Cultural Landscape Report (CLR) and long term treatment plan to be integrated into the HPP	In the Appendices of the Draft HPP there is a section on the CLR data, but a full CLR is not within the Draft HPP. There is a section on the Heritage Landscape, but it is largely having to do with the natural landscape (trees) not the cultural.
Archiving and curation of VA Historic Maps	No files have been located to indicate that this was completed.
National Register Nomination form	The NR form needed to include a discussion on the archaeological resources. Although the content of the NR form has been updated to include a discussion on archaeological resources, there is no mention as to whether any of the many archaeological sites are contributing elements to the district.
Historic Preservation Plan	Last known Draft Copy dates to 2013 and it appears to be in need of a lot of review.
Phase II Testing and Phase III Data Recovery at Buildings 24 and 71	Testing and Evaluation did occur and NR Form states both sites were found eligible. MOA Stip. 3C states that if the sites were found eligible that a Phase III Data Recovery Work Plan would be generated and provided to the signatories for review and would follow protocols outlined in Attachment B. I have no record that either a data recovery work plan or actual data recovery were completed for either of these sites. The report produced by Labat is titled Phase II/III, but no mention of data recovery or data recovery methods are mentioned within the report. It appears that this was not completed for these sites. Construction has since either covered or destroyed parts of these sites.
Avoidance and Protection of Sites 45WW304 and 45WW305	Site 45WW304 was ultimately not avoided by a reroute of Phase I of the 12kV line in 2012. The ten meter buffer that was mentioned in the MOA as a protective measure was not put in place and some trenching did disturb part of the site. Site 45WW305 was supposed to have been avoided altogether by Phase I of the 12kV upgrade project, but it was not avoided by the sewer line upgrade project in 2012. Both sites have experienced disturbance.

Because many of the mitigation measures are incomplete, this NOU also serves to notify the consulting parties that the existing mitigation measures in the MOA will be revised to reflect the current and upcoming construction projects, and new mitigation measures will be added to address the issues of contractor awareness training and site recordation and evaluation.

In summary, the current and upcoming projects on the Walla Walla VAMC consist of the Specialty Care Clinic and the associated parking lot, and Phase Ib of the potable water lines which includes the completion of the installation of buried water line within the Walla Walla VAMC Campus.

The built environment APE was originally defined as the entire campus; however, with completion of many of the original project elements that would have affected other areas of the campus, there is no need to include the entire campus with the revised APE. As a result, it has been reduced to include only the portion of campus that could be visually affected by the construction of the SCC. Construction of the SCC will have no adverse effect on the viewshed of historical buildings as it is located within the existing viewshed of two buildings that were constructed under the 2010 MOA, the Residential Recovery Unit and Outpatient Clinic. Viewshed assessments for these buildings were conducted as a part of the 2010 MOA process. The revised built environment APE is 57,600 meters squared (see attached APE map). The built environment APE overlaps into adjacent City property as a McCaw Era building (ca. 1940s) is situated approximately 20 meters northwest of the northwestern corner of the lot where the SCC will be constructed. As a result, it will be within the viewshed of the SCC and was thus included in the overall built environment APE.

The archaeological APE comprises the expected width and depth of ground disturbance for the individual project elements of the Undertaking (listed above) plus a ten meter buffer along potable water line trenches where feasible. Both the he potable water line APE and the APE for the SCC are located within the boundary of the National Register of Historic Places (NRHP)-listed Fort Walla Walla Historic District. Work will include excavation for the remaining potable water lines, new construction to include excavation for a new building foundation, and removal or modification of landscaping. The Specialty Care Clinic will be constructed in what is currently a vacant lot located on the western end of campus and the potable water lines will be campus wide.

The Walla Walla VAMC previously determined that the proposed projects could have an adverse effect on historical buildings within the campus and possibly on archaeological sites. Extensive archaeological testing was performed along all of the proposed routes for the potable water lines prior to the initiation of this project. At the time of testing, although cultural resources were recovered, no new archaeological sites were recorded. However, the boundaries of two previously recorded sites were expanded. Based on the location of the proposed SCC and its proximity to known archaeological sites, it is possible that cultural resources could be located during excavation for the foundation of the new building. According to historical maps, no buildings stood in the proposed location for the SCC; however, that does not preclude the possibility of locating trash dumps or even building foundations that were not included on maps. As a result, there could be an adverse effect on cultural resources as yet unknown.

In order to facilitate a comprehensive revised MOA, I would like to propose either a series of conference calls or on-site meetings for interested and consulting parties to provide input and comments. It is essential that these calls or meetings happen quickly as the current MOA is out of date and there is no compliance document in place for any of the outstanding projects remaining from the original 2010 MOA. As a courtesy, I have attached a draft copy of the new MOA for immediate review. Please call Katherine Knapp, Walla Walla VA Cultural Resources Management Officer at (509) 525-5200, Ext. 26422 or by email at [Katherine.knapp2@va.gov](mailto:Katherine.knapp2@va.gov) with preference for meetings or conference calls and possible days/times for these meetings.

For additional questions or concerns, please call Katherine Knapp or Tim Andersen, Chief Engineer VA-Walla Walla at (509) 525-5200.

Sincerely,

Brian W. Westfield, MSN  
Director



WALLA WALLA, WA  
1966

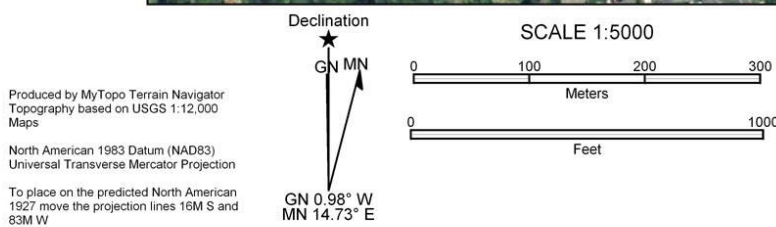
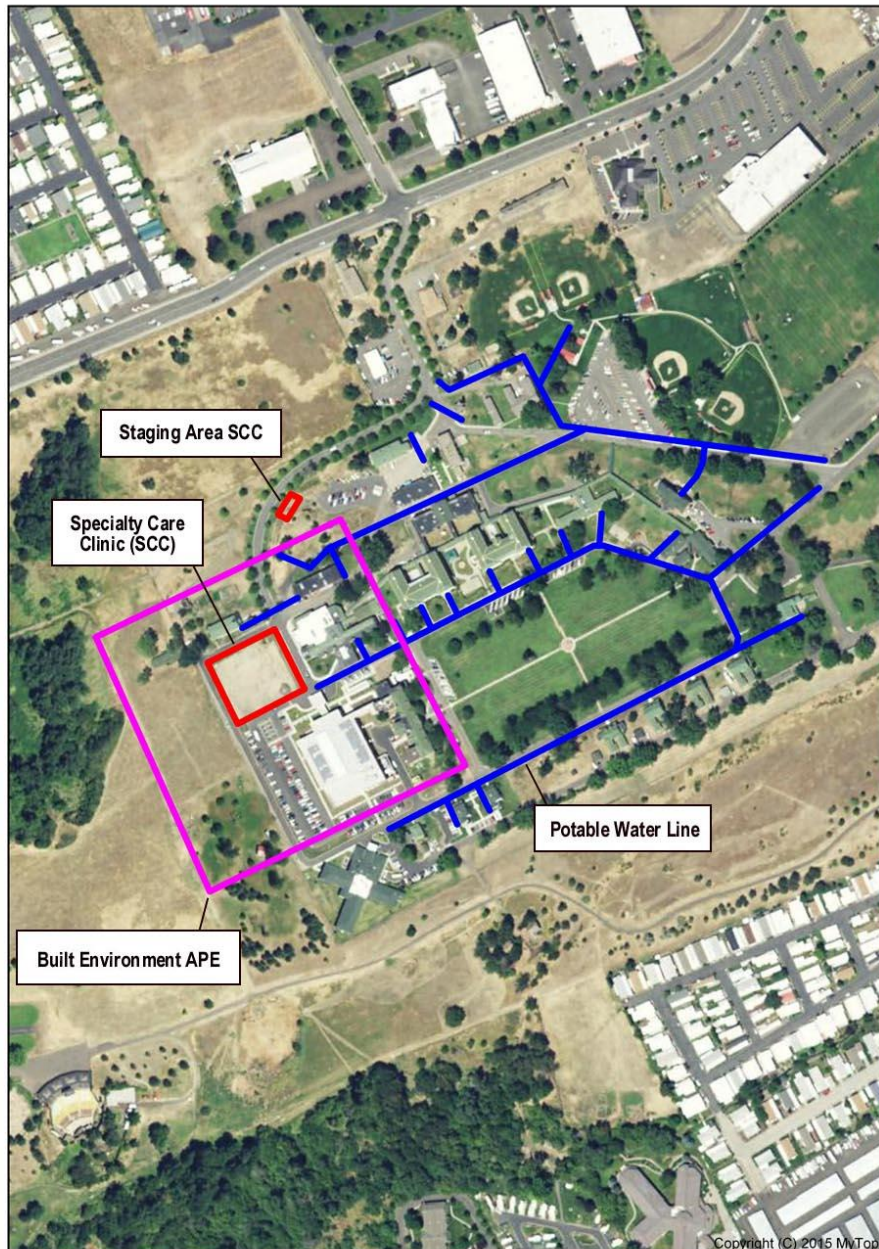
To place on the predicted North American 1927 move the projection lines 16M S and 83M W

CONTOUR INTERVAL 10 FEET  
NATIONAL GEODETIC VERTICAL DATUM 1929



Attachment A  
Undertaking and Area of Potential Effect

WALLA WALLA SW, WA OR QUADRANGLE  
WASHINGTON  
AERIAL PHOTO SERIES



WALLA WALLA SW, WA  
OR, WA  
JUL 8, 2014